



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

NOV 05 2019

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

November 1, 2019

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Juniata College, located at 1700 Moore St, Huntingdon, PA 16652, and write to notify your Office of an incident that may affect the privacy of personal information relating to approximately six (6) New Hampshire residents. The investigation into this event is ongoing, and this notice may be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, Juniata College does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

On March 12, 2019, Juniata College became aware of a suspicious email activity in certain employee email accounts. Juniata College immediately began reviewing this activity and discovered potential unauthorized access to certain employee email accounts. Based on this determination, Juniata College commenced a diligent investigation, which included working with third-party forensic investigators, to confirm the nature and scope of the suspicious activity. Juniata College also changed the passwords for all affected users and conducted analysis to confirm if unauthorized access to the accounts may have occurred and the scope of any unauthorized activity.

On April 22, 2019, this investigation determined that it could not forensically rule out unauthorized access to emails within certain employee accounts. While the investigation has been unable to confirm whether data in the relevant email accounts was actually subject to unauthorized access, in an abundance of caution, working with third party investigators, Juniata College undertook a comprehensive programmatic and manual review of the content of the accounts to confirm what data may be present and to whom that data relates. On July 11, 2019, Juniata College received the results of that review and confirmed there was certain personal information contained within the impacted accounts. Juniata then worked diligently to identify contact information for the relevant individuals in furtherance of providing those individuals with

notification of this incident. Through this effort, on or around October 30, 2019, Juniata confirmed there was information for certain New Hampshire residents present in the relevant emails at the time of the incident. The personal information present in the relevant email accounts may include the following data related to a New Hampshire residents: name, Social Security number, and financial account number.

Notice to New Hampshire Residents

On November 1, 2019, Juniata College began providing written notice of this incident to potentially affected individuals, which includes approximately six (6) New Hampshire residents. Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the potential unauthorized access to the email accounts, Juniata College moved quickly to investigate the nature of the activity, identify those that may be affected, put in place resources to assist them, and provide them with notice of this incident. Juniata College is also working to implement additional safeguards to protect the security of information in its system.

Juniata College is providing written notice to those individuals who may be affected by this incident. This notice includes an offer of complimentary access to one year of credit and identity monitoring services, including identity restoration services, and the contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, Juniata College is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Juniata College is also providing written notice of this incident to other state and federal regulators, as required by law.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4773.

Very truly yours,



M. Alexandra Belton of
MULLEN COUGHLIN LLC

MAB/plm
Enclosure

EXHIBIT A

Juniata College
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



[REDACTED]

November 1, 2019

RE: Notice of Data Privacy Incident

Dear [REDACTED],

Juniata College writes to inform you of a recent incident that may affect the privacy of some of your personal information. While we are unaware of any misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect your personal information, should you feel it appropriate to do so.

What Happened? In March 2019, Juniata College became aware of a unusual email activity in certain employee email accounts. Juniata College immediately began reviewing this activity and discovered potential unauthorized access to certain employee email accounts. Juniata College commenced a diligent investigation, which included working with third-party forensic investigators, to confirm the nature and scope of the suspicious activity. On April 22, 2019, this investigation determined that it could not forensically rule out unauthorized access to emails within certain employee accounts. While the investigation was unable to confirm whether data in the relevant email accounts was actually subject to unauthorized access, in an abundance of caution, Juniata College undertook a comprehensive programmatic and manual review of the content of the accounts to confirm what data may be present and to whom that data relates. On July 11, 2019, Juniata College received the results of that review and confirmed that there was certain personal information contained within the impacted accounts. Juniata then worked to identify appropriate contact information for those individuals whose information was identified.

What Information Was Involved? Based on our investigation, we determined that the following information related to you was present in the relevant emails: name, Social Security number, and medical information. Again, to date, we have not received any reports of any misuse of information.

What We Are Doing. Upon learning of this incident, we immediately took steps to secure the affected email accounts. As part of our ongoing commitment to the privacy of personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems. We are also notifying federal and state regulators, as required.

Additionally, while we are unaware of any misuse of data as a result of this incident, we are offering you access to complimentary credit monitoring and identity restoration services for one year through Experian. More information on these services may be found in the enclosed 'Privacy Safeguards.'

What You Can Do. You can find out more about how to protect your personal information in the enclosed 'Privacy Safeguards.' We also encourage you to enroll in the complimentary credit monitoring and identity restoration services we are offering at no cost to you.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-888-399-9454, Monday through Friday during the hours of 8:00 a.m. to 5:00 p.m., Eastern Time. You may also write to Juniata College at 1700 Moore St, Huntingdon, PA 16652. We sincerely regret any inconvenience or concern this incident may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Troha". The signature is stylized with a large initial "J" and a prominent flourish at the end.

James A. Troha, Ph.D
President
Juniata College

PRIVACY SAFEGUARDS

Enroll in Credit Monitoring Services

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: 1.21.20 (Your code will not work after this date.)
2. Visit the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: [REDACTED]

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your 12-MONTH EXPERIAN IDENTITYWORKS credit 3b Membership:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-890-9332 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-890-9332.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity and to detect errors. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111

www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents: The North Carolina Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents: The Maryland Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, or www.oag.state.md.us.

For New Mexico residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For Rhode Island residents: The Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, or 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There is one Rhode Island resident impacted by this incident.

For New York residents, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.